



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DMP:NJM
F. #2015R01787

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 24, 2017

By FedEx and ECF

Robert J. Cleary, Esq.
Dietrich L. Snell, Esq.
Proskauer Rose LLP
Eleven Times Square
New York, NY 10036

Re: United States v. Dan Zhong and Landong Wang
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter, some of which has been designated “Sensitive Discovery Material” under the terms of the Protective Order dated February 22, 2017 (Dkt. No. 37) (the “February 22 Order”). This disclosure supplements the government’s earlier disclosures under cover of letters dated February 15, 2017, May 22, 2017, May 24, 2017, June 12, 2017, and July 12, 2017. The government renews its request for reciprocal discovery from the defendant.

Enclosed are the following:

- Records from the United States Department of Homeland Security, Customs and Border Protection (“CBP”), which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ062106-DZ062212);
- Records of the United States Department of State regarding non-immigrant visa applications listing Landong Wang as a point of contact or sponsor, which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ062213-DZ062812); and

- Photographs, notes and reports from border searches of the defendant in January 2016, some of which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ062813-DZ062833).

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

BRIDGET M. ROHDE
Acting United States Attorney

By: /s/ Nicholas J. Moscow
Alexander A. Solomon
Douglas M. Pravda
Ian C. Richardson
Nicholas J. Moscow
Assistant U.S. Attorneys
(718) 254-7000

Enclosures (DZ062106-DZ062833)

cc: Clerk of the Court (DLI) (by ECF) (without enclosures)